# Board Rule 277-733 Comment Summation and Recommendations Adult Education School District Directors

Following an open comment session with school district adult education directors held on November 19, 2008, the following summation and recommendations, along with all comments, pertinent to Board Rule 277-733 Adult Education Programs is submitted for the State Board of Education Curriculum Committee's consideration.

The State Board of Education Curriculum Committee should:

- 1. Address only the State legislative audit findings:
  - a. residency requesting proof of residency for all students,
  - b. funding consolidate funding for the first completion outcome GED or Adult
     High School Secondary Diploma, and
  - c. recognition of adult education programs as being below the collegiate/postsecondary level.
- 2. Not change the name of the GED certificate General Educational Developmental Certificate presently issued to persons who successfully passes the five GED Tests.
- 3. Eliminate the proposed language "Utah High School Equivalency Diploma" for successful passing of the GED Tests, as this term does not reflect the rigor associated with a diploma.
- 4. Recognize that the outcomes for a "diploma" are not demonstrated by persons successfully passing the GED Tests.
- 5. Not address changes to the present GED testing eligibility standards. Specifically, out-of-school youth age 16 should not be allowed to take the GED Tests as:
  - a. The rule does not clearly address the impact on in-school 16-17 year olds
  - b. The parameters addressing out-of-school youth being allowed to participate in GED testing are unclear.

## Adult Education Directors' Meeting November 19, 2008

### **Open Comment to Rule 277-733 Adult Education Programs**

#### **First Round Comments:**

Lory Curtis, Jordan District (South Park Academy – Utah State Prison): Section 1, letter D: The words "or its equivalency diploma" should be removed. GED stands for general education development and is not equivalent, therefore not a diploma.

Lynne McKenna, Granite District: Section 1, letter G: ability to grandfather students already working toward a high school diploma and need the credits from the GED to complete the diploma and being given the time (2 year period) to complete the diploma. There is precedence for grandfathering in a 2 year time period in the state office.

Jim Andersen, Salt Lake District: Section, 1 T: definition of out-school-youth. A 16 year old can get a GED and return to the K-12 program. The definition needs to be expanded so that districts do not get funding for students in an adult education program—double dipping—adult education program receives funding for GED outcome and district receives WPU upon students return to K-12 program.

Laura Layton, Granite District: Section 1, letter Y: Questioning the initial assumption of equivalency diploma. I would like to see more investigation from the Board and all stakeholders involved. I do not feel that it is truly an equivalency diploma. There is a content differential. GED is reflective of reading abilities and not necessarily content mastery.

Amy Boettger, Jordan District: I would like to add to Laura's comment that there is a fair amount of scholarly literature that the GED is not a high school equivalency and I would be happy to provide a position paper on that premise.

Brian Olmstead, South Sanpete District: Additional comment about the definition Section 1, letter Y lines 134-135. I am concerned about the equivalency of the GED to the full four year high school experience. The increased graduation standards of the traditional K-12 and adult education programs have a higher standard than the GED.

Loma Prince, Ogden District: Section 1, letter Y, line 138-139: The UHSED is a certificate (rather than the word diploma) issued by the State Office of Education. It should be changed to "Utah General Education Development Certificate."

John Neilson, Beaver, Section 1, Letter Y: When we give a diploma it is issued by the district. According to this USOE, (GED testing centers) will be issuing the diploma for passing the GED. It will be taken out of our hands.

Ralph Squire, South Sanpete: In my opinion as a former principal, the Board needs to listen to the superintendents in regard to Section 1, letter Y. The superintendents need to have a say in this board rule.

Claudia Thorum, Granite District: Section 1, Y: I think that section should be eliminated because the GED is not equivalent to a diploma. This would also change/modify the definition in Section 1, letter O.

Todd Bird, Jordan District (South Park Academy – Utah State Prison): Section 1, Y: If we must award a diploma for passing the GED, then I would rather it would be worded "Utah High School General Educational Development Diploma."

Stewart Shaver, Sevier District: Section 1, letter Y line 425: We could change the word equivalency by adding the word 9th grade or junior high in front of the equivalency diploma.

Vickie Todd, Wasatch District: Section 7, number 3c, line 407: 16 year old returning to high school after completion of GED/AHSC. Students may think they can complete high school if they can complete an adult education program and that option is closed to them upon completion of adult education program/GED.

Ted Heal, Salt Lake District: Section 7, D, Line 407: Concerned about out-of-school youth returning to K-12. Who is going to monitor students who receive a GED in Granite district and then enroll in Salt Lake district?

O'Dee Hansen, (Adult Education Director and K-12 Counselor) North Sanpete District: Section 7, letter D, 4: Not eligible to return to K-12 or adult education programs. I think we are doing a disservice to students if we do not allow them to come back into K-12 or adult education programs to learn the skills to continue, once they have completed the GED.

Scott Carson, Nebo District: Section 7, D: We have grave concerns with 16 year olds taking the GED. I see three problems: 1-I don't see school boards tolerating a swinging door situation where students go back and forth between K-12 and adult education, 2-we set students up for failure, i.e., at risk students, and 3-we are providing an incentive for kids to drop out of school that might not otherwise drop out.

Deanna Sweet, Carbon District: Section 8, letter V, line 539: Regarding either GED or Adult Ed HSD. It seems that a 16-17 year old is not mature enough to make that decision that affects the rest of their life.

Alison Tanner, Granite District: Section 8, letter V, line 533: Regarding someone who takes the GED is no longer eligible to continue in the adult education program. I feel that this is taking away choices from the students. Students are finding that there is a disadvantage to not having the high school diploma in the workforce and in the military as not all branches of the military accept the GED. The student should have the opportunity to complete a high school diploma; the choice should not be taken away. Strike the verbiage "Utah High School Equivalency Diploma", and "may continue in an adult education **only** to improve basic literacy skills.

Dennis Crane, San Juan District: Section 10, D2, line 617: Remove the double dipping by changing the funding formula. Adult education programs would receive partial funding upon completion of the GED and then the remainder of the funding upon completion of the high school diploma. This does not affect student choice of achieving both GED and/or secondary diploma.

LouAnna Haynes, Tintic District: Addendum to what Dennis Crane said. If we are to adjust the funding formula, don't take away the students' option to earn both the GED and secondary diploma. Students are finding that not all branches of the military accept the GED.

Kip Bromley, Alpine District: Section 10, D2: Addendum to Dennis Crane's comment. I think double dipping became an issue as a way to cut costs. I believe adult education is a cost effective way of educating adults. We operate on shoestrings.

Steve Chadez, Box Elder District: I have a concern with the state looking at dropouts. When a student leaves a school to attend an adult education program the student is recorded as a dropout. I would like a way to report to the state that the students who enroll in an adult education program and successfully complete the program or a GED would be reported as a successful high school completion as part of the school district AYP report.

Elaine Jensen, Weber District: no comment.

Jim Stephenson, Cache District: clarification we were told the catalyst was the audit and I am not seeing the connection. I am getting the feeling that this is a done deal and we can comment all we want and it may not make any difference.

Judy Tukuafu, Park City District: If the state of Utah values first class workers and values education highly, saying that a GED is equivalent to a high school diploma is a fallacy. High school offers cooperative learning experiences, research, financial literacy, healthy lifestyles and many other learning opportunities that lead to a better prepared employee. A GED waters down the quality of the workforce of the 21st century.

Darece Sperry, Davis District: A GED is not an equivalent because it does not require demonstrated competency in core areas and essential workplace ." skills, including computer technology, career and technical education, health, fine arts and financial literacy as well as academic discipline.

Susan Patterson, Granite District: If I get a GED in Spanish, or any other language, do I get a Utah equivalency diploma?

### **Second Round Comments:**

Judy Tukuafu, Park City District: Section 4, letter M, teacher credentials. If they already have the two credentials they should be set. It also seems that it should be an internal policy rather than a Board rule. Adult education does not have a student teaching experience such as K-12.

Amy Boettger, Jordan District: Section 7, D3: I would like to see this requirement (SEOP discussion) presented at the K-12 level and not the adult education level. I would like to see a requirement of counseling at the K-12 level before they are released. I see this as an inherent conflict of interest for the adult education program.

Laura Layton, Granite District: Section 8 letter H 1E, line 453: Re: passing all GED tests. I would rewrite this so that if someone passes the GED before July 1, 2009, those 5 units of credits can be used at any time for a diploma. I would strike that part that says they have to be in UTopia as adult learners are sometimes on a long range plan.

Alison Tanner, Granite District: Section 10, D2: I think there should be more discussion on the either/or proposition. I think there should be a way to appropriately pay programs based on each situation.

Deanna Sweet, Carbon District: One thing that occurred to me is the workforce. 16 year olds do not have the same rights in the workforce as older persons. What are these 16 year olds going to do once they have this diploma? What happened to mandatory education to age 18?

Claudia Thorum, Granite District: If in fact the GED awarding of credit is regulated by GED testing services, I would like to see a substitute competency exam to allow students to have credit awarded based on mastery of curriculum replace the five units of credit.

Brian Olmstead, South Sanpete District: Address everything in yellow and red. As we propose something to the Board, we should be focusing on the audit issues. The audit clearly says that we need to do something about residency and something about funding. I think the GED issue crept in, and the audit did not ask us to address this issue. Let's make the corrections necessary to address the audit. I don't think we should rush forward on the GED issue.

Gwen Callahan, Emery District: I think we have all been insulted by the equivalency issue. I think the audit says the GED is the end of the high school experience. I think we are all concerned about having something for the 16 year old out-of-school youth. We can go through all of this line by line, but the bottom line is that we are still hung up on the "equivalency" issue. There are other ways to deal with 16 year olds and out-of-school youth. I don't want to take away from the high school experience to address the 16 year olds.

Terry Linares, Superintendent, Tooele District: I am also concerned about the 16 year olds. We are responsible for the rigor of high school. A GED is not equivalent. LEAs should be part of the process. There needs to be further conversation and looking at all the options available to the student.

Jim Andersen, Salt Lake District: I would like to go back to the definition of out-of-school youth. The definition needs to be expanded. The situation we are creating in connecting K-12 counselors to adult education is encouraging more students to become out-of-school youth. There is no data base to track students that have passed the GED. That would prevent students enrolling in another district allowing that district to generate funds.

Scott Greenwell, Davis District: Our state school board members are elected officials. Elected officials do not always make the right decisions. But at the same time we have an obligation to let the board know that there isn't an adult education director or coordinator who believes that the GED is really the equivalent of a high school diploma. At the same time, I don't believe that there are any adult education directors or coordinators who cannot live with an either/or funding for outcomes for the GED and secondary diploma. I just don't want to see our funding cut, instead, combine the two outcomes into a single funding source.

John Nielson, Beaver District: Funding issue. If a student gets a GED and that is the end of funding, how can we provide additional services for the student who wants to continue?

Claudia Thorum, Granite District: If we are trying to address the 16 year olds, we should require that they are not shown as dropout if they are enrolled in adult education.

#### **Mail-in Comments:**

Donica Bigelow, Uintah District: There is one talking point that I think needs to be emphasized to the directors today - THE FIVE CREDITS (TEN CLASSES) that have been associated with the GED WILL GO AWAY regardless of what the final outcome of this is. We are now going to be requiring adult students to spend OVER A YEAR more in school to get a diploma than we have been able to offer. For those worried about money, they will get another year of enrollment status for these folks and over a year of contact hours plus 10 more classes worth of credits if they think they can retain these students for that amount of time.

The bottom line for me is that this is an issue of perception. Nationally, business and industry support GED equivalency. By issuing an equivalency diploma, we allow students to mark the

box on applications that reads, "Do you have a high school diploma". My experience has been that adults that do not have a diploma have apprehensions about pursuing post-secondary education and some employment fields because they don't believe they're qualified to approach these types of opportunities. The equivalency diploma will open doors for them and build confidence to pursue higher goals.

Those students lacking skills to complete a GED haven't lost anything. They will still be allowed to complete 24 credits and graduate with a diploma.

Sue Myers, Weber District: The GED should continue to be issued by the USOE and should be called General Education Development Certificate. There is no reason to call it something that it is not. All the businesses represented on the OWATC Advisory council will accept a GED and accept it in English or Spanish. I think that the EDUCATION BOARDS perhaps see 16 and up GEDs as being a quick fix to the high drop-out rates we are starting to see in Utah.

Nelda Kissinger, Washington District: I have spoken with my own staff and principals and counselors from our local high schools. They are very concerned about the changes that are being suggested and wanted to go on record that they are opposed to changing the name of the GED to an equivalency diploma. They were also surprised about the changes that are being proposed that will allow 16 year old students to leave high school and take the GED. We felt that if the board insists on implementing these changes that some type of requirements should be attached before a 16 year old could take the test. It was suggested that a team meeting (sort of like an IEP team) be held with the student, parents, school counselor, and a representative from Adult Education to review where the best placement of the student would be. If the student is functioning on a 9th grade level and above and is mature enough to attend an adult high school, then the district should require the student to complete a GED preparation course with Adult Ed. The district did not want to teach GED preparation courses at the high schools because they felt that it belonged to the adult education program. We also felt that if the student passes the GED, or gets a high school diploma with adult education the district should be able to count them a a graduate and not a drop out. Washington District did not want to allow students to transfer back and forth between the district schools and adult education It has always been the policy that if the student withdraws from K-12 to attend adult education they cannot return to their own high school to graduate. We felt that the discussion about what to call the GED was just an issue of

semantics. If the board wants to change the value of a GED to be held equal to a diploma they could do so without changing the name. The public will always refer to it as a GED and educators will never agree that it should be called a diploma. They can simply change the regulations and attach some type of stipulations in their policies about who can take the GED and they certainly can fund adult education differently for our outcomes to eliminate double dipping. We personally liked the suggestion about not funding outcomes for the GED and diplomas, but to put more funding into all of the other categories. That would greatly assist the programs who have a large percentage of ABE students who require a lot of time, effort, and expense, and who may only make one level gain in an entire year. It makes sense to fund contact hours, credits earned, level gains, and enrollees because that rewards the daily work that prepares the way for the outcomes of completing the GED or a diploma. We all have students whom we have worked with all year who for some reason or another never end up taking all sections of the GED or are just a few credits short of a diploma. It would also solve the problem in the prisons of one program doing all of the preparatory work and then the inmate either gets transferred or released right before they take the GED or get their diploma and then the receiving prison gets the funding for the outcome. It happens all the time and is very frustrating. I personally feel that if the board is intent on implementing these changes, then it would be politically dangerous in a time of reduced funding to be argumentative and resistant to change. I would like to see adult education try to find ways that we could make it work that would be beneficial to adult education and to the school districts. I don't think that the districts want to see their WPU reduced due to students leaving high school to take the GED beginning at the age of 16. Let's try to form some type of partnership with the districts where adult education becomes an important part of their drop-out prevention plans by providing the preparation for these students who are intent on leaving. Perhaps we could change the regulation of "out of school youth" to a "dual enrollment" student and sending the full WPU to adult education for the period of time that the student is preparing for the GED. By making some type of preparation mandatory, the students will have a better chance of passing the GED. In our discussion on Wednesday, we never did address what will happen to these 16 year olds who do not pass the GED.

Linda Conway, Tooele District: Section 1.Y. The Utah Adult Education Program currently offers a General Educational Development Certificate for people 17 years and older. This accommodation is adequate as it stands. The terms "equivalency" and "diploma" should not be used when referring to a seven-hour reading evaluation. The words "equivalency" and "diploma" will confuse both businesses and students. Most businesses do not comprehend the minute amount of intellectual ability that the GED evaluates. They will assume prospective employees have more schooling and training than they actually have. Students coming to adult education programs often assume the GED and high school diploma are two different terms for the same outcome until we explain the difference. Then they almost always prefer to pursue a diploma and just use the GED as a stepping stone. If a 16 year old completes the GED, he/she will still be too young to be hired by most companies. They will continue to work in the same occupations at which they currently work (fast food, retail, etc.) part time while attending school. Will colleges be willing to accept many sixteen-year-old-youth with GEDs? Sixteen-year-old youth should be accommodated in the school system until they are eighteen and capable of making a more mature and beneficial decision.